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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

**UNITED STATES OF AMERICA  
vs.  
MARTINEZ-Pulido, Salvador**

) Magistrate's Case No.

2008 AUG - 27 AM 9:46  
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CLERK US DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

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**COMPLAINT FOR VIOLATION OF**  
**21 U.S.C. 952 and 960      '08 MJ 2392**

## **Unlawful Importation of a Controlled Substance**

The undersigned complainant being duly sworn states:

**COUNT ONE**

That on or about August 1, 2008, within the Southern District of California, defendant Salvador MARTINEZ-Pulido did knowingly and intentionally import approximately 282.14 kilograms (620.70 pounds) of marijuana, a schedule I substance, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached probable cause statement, which is incorporated herein by reference.

**Eveleen Cabrera**  
**Signature of Complainant**  
**U.S. Immigration and Customs Enforcement**

Sworn to before me and subscribed in my presence, this

4th day of August, 2008.  
Arthur B. Roselli

## **United States Magistrate Judge**

1 United States of America  
2 VS.  
3 Salvador MARTINEZ-Pulido

4 PROBABLE CAUSE STATEMENT

5 I, Special Agent Eveleen Cabrera, declare under penalty of perjury, the following is true  
6 and correct:

7 On August 1, 2008, at approximately 6:55 p.m., Salvador MARTINEZ-Pulido entered the  
8 United States from Mexico through the Otay Mesa Commercial Port of Entry (POE) in a 1998  
9 Freightliner tractor bearing California license plate 9E17479 and a 1986 Great Dane trailer  
10 bearing California license plate 4ER5388.

11 A Customs and Border Protection (CBP) Officer was working the empty portal x-ray,  
12 when he came in contact with MARTINEZ, who was attempting entry with an empty trailer.  
13 The Officer noticed that the front wall of the refrigerated unit appeared abnormal on the x-ray  
14 image. MARTINEZ made a negative Customs declaration. The Officer referred the tractor,  
15 trailer and driver to the intensive dock for further examination.

16 At the secondary inspection intensive dock, MARTINEZ submitted his documents to a  
17 CBP Officer and was directed to the waiting area while the tractor-trailer was inspected. Upon  
18 inspection, the Officer noticed anomalies in the refrigerated unit of the trailer. The Officer  
19 opened an access panel to the refrigerated unit on the outside of the trailer. The Officer noticed a  
20 black metal plate covering the motor of the unit and also noticed that the bolts on the access  
21 panel had been tampered with. The Officer removed the bolts to access the inside of the unit and  
22 then requested a Canine Enforcement Officer (CEO) to screen the vehicle.

23 A CBP CEO screened the tractor-trailer using her Narcotics Detector Dog (NDD). The  
24 NDD alerted to the odor of narcotics. Another CBP Officer, also assisting in the inspection,  
25 looked at the bottom right hand corner of the refrigerated unit and noticed a cellophane wrapped  
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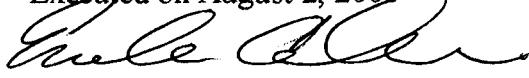
1 package inside a void space between the wall and the refrigerated unit. The Officer used a screw  
2 driver to attempt to move the package. Upon doing so, the screwdriver punctured the package  
3 and the Officer heard a "hissing sound". The Officer noticed a pungent odor emanating from the  
4 package.

5 Further inspection of the tractor-trailer revealed forty-two (42) wrapped packages  
6 discovered in the refrigerated unit. A CBP Officer probed one random package of a green leafy  
7 substance, which field-tested positive for marijuana. The total weight of the marijuana seized  
8 was 282.14 kilograms (620.70 pounds).

9 Post Miranda, MARTINEZ denied knowledge of the marijuana. MARTINEZ said he  
10 was only told to drop the trailer off at a paid-parking lot in the Otay Mesa, CA area.

11 MARTINEZ was arrested for violating Title 21, United States Code, Sections 952 and  
12 960, Unlawful Importation of a Controlled Substance. MARTINEZ was booked into the  
13 Metropolitan Correctional Center, San Diego, CA on the above charges.

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17 Executed on August 2, 2008



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Eveleen Cabrera  
Special Agent,  
U.S. Immigration and Customs Enforcement

On the basis of the facts presented in the probable cause statement consisting of 2 pages,  
I find probable cause to believe that the defendant named in this probable cause statement  
committed the offense on August 1, 2008 in violation of Title 21, United States Code, Section(s)  
952 & 960.

United States Magistrate Judge

Date/Time

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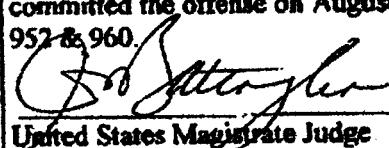
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United States Magistrate Judge

Date/Time

8/2/08 9:50 pm